March 31, 2008

RETI Stakeholder Steering Committee

RE: Renewable Energy Transmission Initiative Phase 1A DRAFT REPORT - B&V Project Number 149148.0010

Dear RETI Stakeholder Steering Committee,

The Center for Biological Diversity is pleased to be able to submit these comments on the Renewable Energy Transmission Initiative Phase 1A Draft Report - B&V Project Number 149148.0010. The Center is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 40,000 members throughout California and the western United States, including all of the states that are the focus of the RETI process. The Center for Biological Diversity supports the development of alternative energy sources, including appropriately sited solar and wind power projects, as a way to reduce our impact on the environment. Alternative energy sources are critical to reducing greenhouse emissions and protecting wildlife habitat.

While the Center supports the vision of a comprehensive approach to siting renewable energy projects and their delivery systems, we are disappointed at the paucity of data devoted to the environmental issues in this draft. One and a half pages out of 255 on "Environmental Considerations" are completely inadequate to address the process of evaluating the complexities of the on-the-ground resources. We found the report biased to addressing other aspects of the renewable energy issues, while basically ignoring the environmental aspects. If the RETI process is truly a collaborative process, then the environmental issues need to be incorporated at the beginning of the process, not delayed to a future time and future reports.

We admire the excellent work done by NREL, but provide these specific comments to aid in improving the next draft of the report. We failed to find a list of exclusion zones anywhere in Section 6, as noted in Section 3 on page 3-20. "Fatal flaw" environmental screening is referenced but not defined. All of these missing data need to be included and expanded upon in the next version of this report.

The future development and ranking of "renewable energy zones" must include environmental factors, which must be considered equally with economic and other factors.

The Center supports wilderness and national parks as exclusion zones, but many other types of constraints must also to be taken into serious consideration including but not limited to:

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- federally listed threatened and endangered species and their critical habitats;
- state-listed threatened, endangered and rare species and their habitats;
- State and local parks;
- conservation areas assembled and protected under state, federal and local conservation plans;
- private and public conservation areas;
- mitigation areas and mitigation banks;
- riparian areas and wetlands;
- waters of the U.S. and public trust lands and waters;
- areas on public lands specified for species conservation (for example the Desert Wildlife Management Areas [DWMA's] in the California Desert Conservation Area, which are essential for the conservation and recovery of the state and federally listed desert tortoise);
- Crucial wildlife linkages;
- Wilderness study areas;
- Areas of Critical Environmental Concern (ACEC's) and Unusual Plant Assemblages (UPA's) - as designated by the BLM);
- And other areas identified as critical conservation areas for plants and animals;

We have been working with Center for Energy Efficiency and Renewable Technologies (CEERT) and other conservation organizations including Sierra Club and Natural Resources Defense Council (NRDC) since June 2007, specifically on a constraints map for the California Desert Conservation Area (CDCA). As you know the CDCA has some of the best solar resources in the country. We have assembled numerous data in the form of Geographic Information Systems (GIS) "layers" on environmentally constrained areas, including DWMA's, critical habitats, ACEC's, UPA's, wilderness, wilderness study areas, wildlife linkages, rare species locations and more. Most all of these layers are publicly available (some are generated by private non-profits, who gave us permission to use them). These data need to be included as apart of the decision making process immediately.

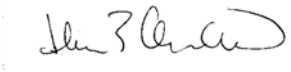
We are continuing to collect GIS data on other environmental constraints, including private land conservation areas, State parks and conservation areas, and fire zoning. We are also tracking down groundwater basin data (specifically aquifers that are currently known to be in overdraft) because decreasing water tables' potential impact on biological habitats.

While we are assembling a comprehensive data set on the biological and ecological constraints, additional data on cultural constraints needs to be included early on in the process, too.

In our brief review of the economic constraints considered, one glaring omission was the evaluation costs of mitigation to off-set the impacts to biological resources. Despite careful siting, these projects may impact sensitive resources. The cost of and feasibility of mitigation needs to be considered at the beginning of the process. In some areas of the California desert, for example, there simply are not adequate areas for mitigation to occur.

Lastly, the Center is submitting only brief comments on this draft report, because the single week review timeline precludes the thorough review that this 255 page document deserves. We urge the Steering Committee to provide all stakeholders and the public adequate time to review future draft documents. The Center looks forward to continued participation in the RETI process.

Sincerely,



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